

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: **JUL 30 2008**

UNITED STATES OF AMERICA

: INFORMATION

-v.-

: 08 Cr.

SUSAN PETITDEMANGE,

:

Defendant.

:

**08 CRIM 700**

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COUNT ONE

The United States Attorney charges:

1. From in or about June 2006, up to and including in or about January 2008, in the Southern District of New York and elsewhere, SUSAN PETITDEMANGE, the defendant, unlawfully, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, for the purpose of executing such scheme and artifice and attempting so to do, did place in a post office and authorized depository for mail matter, matters and things to be sent and delivered by the Postal Service, and did deposit and cause to be deposited matters and things to be sent and delivered by private and commercial interstate carriers, and did take and receive therefrom, such matters and things, and did cause to be delivered by mail and such carriers, according to the direction thereon, such matters and things, to wit, PETITDEMANGE, having devised a scheme to fraudulently obtain money from her

JUDGE KEENAN

former employer by submitting fraudulent invoices to her former employer for payment, caused fraudulent invoices to be delivered by mail to an address in the Southern District of New York.

(Title 18, United States Code, Section 1341.)

FORFEITURE ALLEGATION

2. As a result of committing the offenses alleged in Count One of this Information, defendant SUSAN PETITDEMANGE shall forfeit to the United States, pursuant to 18 U.S.C.

§ 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the said offense, including but not limited to the following:

a. At least \$1,309,900.74 in United States currency, in that such sum in aggregate is property representing the amount of proceeds obtained as a result of the offense charged in Count One;

b. Any and all funds in account number 0048 3399 3665, in the name of Dartford, Inc., located at Bank of America, and all funds traceable thereto;

c. Any and all funds in account number 0048 3399 4062, in the name of Declan's Discounts, Inc., located at Bank of America, and all funds traceable thereto;

d. Any and all funds in account number 0048 3399 4059, in the name of Declan's Discounts, Inc., located at Bank of

America, and all funds traceable thereto;

e. Any and all funds in account number 0048 3399 4033, in the name of Declan's Discounts, Inc., located at Bank of America, and all funds traceable thereto;

f. Any and all funds in account number 0094 9185 3649, in the name of Susan Petitdemange, located at Bank of America, and all funds traceable thereto;

g. Any and all funds in account number 539-33373, in the name of Declan, located at ING Bank, and all funds traceable thereto;

h. Any and all funds in account number Z23071994, in the name of Susan Petitdemange, located at Fidelity Investments, and all funds traceable thereto;

i. Any and all funds in account number Z23072028, in the name of Susan Petitdemange, located at Fidelity Investments, and all funds traceable thereto;

j. Any and all funds in account number 323082961 in the name of Susan Petitdemange, located at Fidelity Investments, and all funds traceable thereto;

k. Any and all funds in account number X11964700, in the name of Andrew Thompson, located at Fidelity Investments, and all funds traceable thereto;

l. Any and all funds in account number X11964859, in the name of Andrew Thompson, located at Fidelity

Investments, and all funds traceable thereto;

m. One Silver Land Rover Sport, Pennsylvania License # GWY-8495, VIN# SALSH23406A974505;

n. One Red with Black Stripes Dodge Viper, License # GVF-6826, VIN# 1B3ER69E6VV300389;

o. One Black BMW 335i, License # GXF-3681, VIN# WBAWL735X7PX42633; and

p. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 113 Amber Drive, Oxford, PA 19363, held in the name of Susan Petitdemange and/or Andrew Thompson.

Substitute Asset Provision

q. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third person;

(3) has been placed beyond the jurisdiction of the Court;

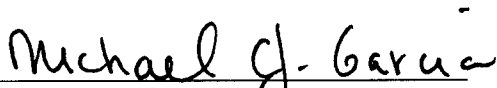
(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. §

853(p), to seek forfeiture of any other property of said defendant(s) up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981, and  
Title 28, United States Code, Section 2461.)

  
MICHAEL J. GARCIA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

SUSAN PETITDEMANGE,

Defendant.

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(18 U.S.C. § 1341.)

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MICHAEL J. GARCIA

United States Attorney.

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7-30-08 (WR): Filed Information and Waiver of Indictment.  
Deft. present with atty. Sarah Baumgartel. AUSA Howard Master  
present. Deft. pleads guilty as charged. Court accepts plea.  
PSI ordered. Sentencing date: 11-12-08 at 10:15am. Bail cont'd:  
\$100,000 PRB, Secured by property, travel restricted to SDNY, EDNY, N.J.  
& Pennsylvania, Surrender travel documents & No new applications.  
Keenan, J -